

Dr. Cohen has taught Jewish Philosophy and Thought at Haifa and Tel Aviv Universities for many years.

WOMEN AND THE STUDY OF TALMUD

INTRODUCTION

For men, the study of Torah is parallel (and perhaps even superior) to prayer as a form of worship of God, and daily study is no less mandatory for the Jewish man than daily prayer. Women, however, are exempt from any serious Torah study; in fact this area of spiritual growth has been out of bounds for the vast majority of Jewish women until quite recently. It is our present object to consider both why this has indeed been so, and why it is less and less so for more and more Jewish girls and women today.¹

The content of education as a preparation for life may be stratified into three separate areas or levels. First, there is the basic level of acculturation. Second, there is the acquisition of practical skills. Third, there is that type of knowledge which develops the higher levels of personality and equips its bearers for leadership. We wish to examine these three areas in various periods.

WOMEN'S EDUCATION IN PRE-MODERN TIMES

In the traditional Jewish world, great care is and always has been devoted to the inculcation of the basic level of acculturation. This is that level of knowledge necessary to be a functioning member of the community. For girls this was conceived to be the basic laws of Shabbat, kashrut, appropriate sexual behavior, and the major prayers and blessings. It was often done informally in the home, but it was nevertheless done.

Another thing which knows few boundaries in the Jewish world—whether of time or place—is elementary literacy. From the ample evidence,² I will bring two sources from the middle ages³—one from the Sephardi, and the other from the Ashkenazi world—chosen because they show that girls in general, and not merely exceptional ones, were given a basic elementary education.

In an oft-quoted responsum of Maimonides,⁴ we read of a young woman who, after having been married at the age of nine and sporadically abandoned by her husband without means of sustenance, turned to the teaching of *humash* to little children. This woman, who lived somewhere in upper Egypt in the 12th century and who was obviously of extremely poor circumstances, nevertheless had acquired sufficient knowledge to become an elementary teacher together with her brother. Maimonides expresses no surprise at a woman pursuing this occupation.

No less significant is the testimony of a pupil of the famous Christian scholastic Abelard, of 12th-century Paris,⁵ who contrasts the Jewish norm concerning education with that customary among Christians in his day. He writes that

. . . if the Christians devote one son to learning it is out of self interest, so that he will be able to help his father and mother and brothers . . . and since he has no heirs the other sons will inherit him. . . . But the Jews send all their children to study out of religious zeal and love of the law. . . . Even the poorest of the poor, even should he have ten children, will teach them all, not for any mercenary consideration, like the Christians, but solely in order for them to understand God's Law. This includes not only his sons, but his daughters as well.⁶

Abelard may have been exaggerating for effect, but this certainly indicates that Jewish women did not refrain from religious studies.

Girls have also always been taught whatever practical matters were deemed necessary for them to take their place as useful members of society—not only housekeeping, but quite often also business or other skills, depending on time, place, and circumstances. However, since our subject pertains primarily to the Jewish educational content, this area is beyond the confines of the present article.

When we review what we have just described, the results are quite impressive quantitatively. Nevertheless, though exactly what girls were taught in different times and places varied, there is a common denominator: the level of Jewish education for women has always been a significantly lower function of that which was considered the norm for the men in the same community.

I think this is almost certainly a direct result of the utilitarian principles upon which the educational goals were based. Girls were taught what they had to do, and whatever might be necessary for them to do it well was taught wholeheartedly. That education whose object it is to prepare its recipients to be creative, and public leaders—what in the Western world would be called a “liberal education” and in the traditional Jewish world consists of the more advanced avenues of Torah scholarship—was not thought to be of any utility for women.

I would argue that it was taken for granted, both within the Jewish community and outside it in the gentile society the world over, that women could not possibly attain even limited positions of community leadership, public office, legal administration, etc. This was either because of their assumed natural biological inferiority, or because it ran counter to what was looked upon as the “natural good order” of society. Clearly, as *Sefer Hasidim* so aptly put it, girls “did not have to study”⁷ the profundities of the Halakhah and casuistic argumentation, i.e., training in the primary Rabbinic sources of Talmud and *posekim*, since women, except perhaps for queens, were axiomatically excluded in all then-known societies from positions of leadership—whether cultural or political.

INNOVATION IN THE EDUCATION OF BOYS AND GIRLS IN THE 19TH AND EARLY 20TH CENTURIES

The opening of Jewish schools for girls in the late 19th and early 20th centuries, particularly by Sara Schnirer, was a major watershed in the history of Jewish women’s education. It was she who founded the Beth Jacob movement with a view to bridging the ever widening social and cultural chasm which separated young Jewish girls in eastern Europe from their spiritual roots.

But this is not quite how it all started. As we shall argue directly, it was first and foremost the large-scale defection of boys from the traditional Jewish educational framework which forced innovations to be introduced in the forms of Jewish education, both in Eastern Europe and elsewhere. Only afterwards was attention turned to the revamping of the education of girls.

Hence, in order to be able to view the developments in the Jewish education of girls in their proper perspective, we shall perforce have to make a short digression to consider the prior developments in the traditional education of boys.

As noted, there was a mass defection of boys and young men from the Torah world because of economic and social factors. Much of the time boys and young men had been left entirely to their own devices, and were thus ideal candidates for the burgeoning Hasidic movement. They were drawn by the warm, soul-satisfying but uncontrolled and potentially antinomian world of Hasidism⁸ which provided the isolated adolescent boy and young man with wonderful feelings of identity, warmth, and dedication—not unlike many of the present day *baalei teshuvah* frameworks.

At the same time, other young men, also thirsting for wider vistas, often filled much of their time imbibing the heady drink of

secular Haskalah literature, which was already widespread in eastern Europe.⁹

Both of these avenues of defection were countered by the development of large scale yeshivot, the famous Yeshivat Volozhin being the first and most outstanding of its kind. Until Volozhin, the young adolescent scholar generally studied in a *klois*, i.e., either entirely alone or in the company of a very few boys and men of varying ages under the intermittent supervision of the local rabbi.¹⁰ In this new-style yeshiva, hundreds of boys were gathered together away from home, stratified roughly according to age, and were provided with a regular program of daily study. They were also put under the careful supervision of *mashgihim* and were provided with other educational mechanisms aimed at regulating both their spiritual and intellectual diets and their overt behavior.

In short, long before the development of an awareness of the existence of serious problems respecting the education of girls, it was realized that *due to changing conditions* neither the home nor the local community were able to ensure the continued loyalty of the adolescent boy, and that in order to achieve this, he needed to be provided with a formal educational framework and a clearly defined and demanding ideal—something important for everyone, but particularly vital to the young.

This ideal was the study of *Torah lishmah* (studying Torah for its own sake)—and was a conscious “answer” to the Hasidic challenge.¹¹ But, just as the Hasidic community is exclusively male-oriented without parallel institutional frameworks for women, so too R. Hayyim, the Rav of Volozhin, provided an alternative framework to Hasidism for boys and men, without parallel institutions for girls and women.

The girls and young women were thus inadvertantly almost forced to turn to Haskalah and to non-traditional, even non-Jewish, social frameworks. And the situation was exacerbated by the fact that many of the husbands, fathers and brothers ran off to the local Rebbe’s “*tisch*” as soon as they could on Shabbat. Before the major holidays, entire trains were hired for a mass exodus to some of the major Hasidic courts. A large number of both boys and men were attracted, like moths to the light, thus leaving the women and girls at home alone without any warm Jewish atmosphere, at a time when it was most needed.¹²

The Hasidic institutional framework did not have a place for wives and daughters;¹³ now, to compound matters, the new type of yeshiva was ever increasingly removing the remaining young men who were not attracted by the Haskalah from the environs of town and family.

At the same time, the institutional remedy of the Volozhin and later Hungarian and other yeshivot, was hardly a solution for girls, even in separate institutions. The problem was the very core of the educational ideal central to this new type of yeshiva. In the yeshivot, every means possible was brought into play to imbue in the aspiring young scholar an uncompromising dedication to Talmudic learning “for its own sake,” to the complete exclusion of all worldly pursuits.

Such an obviously impossible ideal for girls ruled out this framework as a potential model which might somehow be adapted for them.¹⁴ In fact, I would suggest that this very stress upon the boy’s duty and privilege, *as a male*, to concentrate on Torah study to the exclusion of all else, may well have contributed to the unduly categorical downgrading of Jewish education for girls.¹⁵ This, together with the other sociological developments just mentioned, seriously aggravated their already existing cultural deprivation.

With this as background we may now understand why the breakthrough respecting the Jewish education of girls did not take place in eastern Europe, which was so much more “Jewishly Jewish” than Frankfurt-am-Main where it actually occurred.

In contrast to the situation in the Hasidic and yeshiva worlds, when Samson Raphael Hirsch opened what might well be termed the first good Jewish day school, in Frankfurt, it was only natural for him to include girls in his educational endeavour, as in Germany both boys and girls had long been educated in *Gymnasia* (the European term for what we call schools and high-schools), and girls’ classes were an integral part of this institutional framework.¹⁶

In the school founded by Samson Raphael Hirsch, the educational ideal was the creation of a well rounded “*Yisroel-Mensch*”—that is: “Jewish-Person”¹⁷—an ideal eminently fit for the education of both boys and girls. Further, though the curriculum indeed included a significant amount of Jewish studies of all kinds, it had Talmud only in the upper forms.

Thus, neither the educational ideal nor the specific curriculum offered had to be radically altered in order to adapt it to what was looked upon as appropriate for the parallel girls’ classes. Indeed, the girls were here offered a rich Jewish curriculum very similar to that of the boys¹⁸—one which demanded serious intellectual application in Jewish studies.

It was this prototype which, some 60 years later, Sara Schnirer transferred to the yeshiva and Hasidic world of eastern Europe. There, after an initial period of apprehension, it was enthusiastically adopted, though the curriculum, in keeping with the utilitarian aspects of Jewish education, emphasized that which women would

need in daily life and placed great stress on indoctrination and on practical, as opposed to theoretical, knowledge.

The Beth Jacob schools must have been revolutionary in their time and place, judging by the opposition they initially fostered. Significant too is the fact that the relevant *pesika* respecting formal Jewish education for girls explicitly took into account such considerations as the changes which had occurred in the status of women in contemporary society and in the lifestyle of women within the Jewish community, as well as the functions women were more and more being called upon to fulfill in such vital areas as formal and informal education. It was clearly recognized that these called for an increasingly higher level of Jewish education for Jewish women.¹⁹

Nevertheless, in very fundamental ways the Beth Jacob schools were a continuation of the traditional attitude towards women's education and their place in society noted above. Jewish women's intellects had been aroused by the increase in the general cultural level of the times. The new institutions set themselves to meeting this challenge by offering an educational menu with enriched Jewish content. They did not seek to prepare girls for spiritual or communal leadership.²⁰

THE CONTEMPORARY SCENE

We are now again living in an era of radical change—no less radical than that of the 19th and early 20th centuries. We are in the throes of a traumatic social hurricane, although—being, as we are, within its vortex—we can only with difficulty differentiate between the temporary upheavals and the lasting changes following in its wake.

But certainly the recent technological advances and sociological developments have altered women's existential condition almost beyond recognition, and have gone a long way towards making the full-time housewife obsolete. Taken together, the refrigerator, the freezer, the microwave oven, synthetic fabrics, washing machines and dryers have considerably weakened the timebinding aspect of homemaking.²¹

These, plus the shorter work week for both men and women, the advances in communal infant and pre-school care, and the reasonable expectation women have of enjoying many fruitful and active years after their child-bearing and child-rearing years are over, have together made it not only feasible, but most desirable from society's point of view, to channel the time and energy thus made available into productive, satisfying activity. And this is in fact occurring to an ever greater extent, both in the world of work and in the avenues of communal life and public office.

This does not mean that women will no longer be programmed in the role of physical creators of the “here and now,” or that men will no longer continue to be assigned the major roles in the ritual which gives symbolic expression to the metaphysical dimension.²² However, some things about women’s nature which were once axiomatically so are so no longer. The intellectual capacity of the average girl is today very different from what Maimonides deemed it to have been,²³ just as women today live longer than men, but weigh less. (Maimonides states categorically that women are usually shorter-lived than men,²⁴ and in *Bava Metsia* 79b it is taken for granted that women weigh more than men.) Apparently, changing circumstances have altered women’s “nature.”

CONCLUSIONS

Whether one accepts the position of women in modern society merely as a “given” or, more positively, as something to be welcomed, the inevitable corollary is that one can no longer confine girls’ education to acculturative and instrumental levels. Women today are increasingly being co-opted into the privileges and responsibilities of all levels of educational, cultural and communal endeavor. This is why the Jewish education of girls is beginning to be conceived in essentially the same terms as that considered appropriate for any educated layperson, which in the view of contemporary Torah-true educators clearly includes a serious introduction into the intricacies of the core subject of Jewish tradition—the world of the Talmud and the *halakhic* process.²⁵

Some who object to the inclusion of serious Talmud study for girls in the curriculum of the modern Jewish day school probably do not consider it—time consuming as it is, and requiring the acquisition of difficult skills—to be an essential ingredient of a well-rounded Jewish education, whether for girls or for boys.

Others may oppose it because of the negative evaluation of the existential situation just outlined, in which women now have an important place in the public domain, on the same footing as men, and they do not wish to accommodate such developments as a “given.”²⁶

In any event, I think we can reasonably argue that this is first and foremost a question of educational strategy rather than of Halakhah *per se*. Even Maimonides, who was far from endorsing the teaching of Torah to girls, considering as he did the average girl to be inferior mentally, nevertheless in the same context also unequivocally states that girls who do study are indeed engaged in a meritorious undertaking.²⁷

To sum up: if our foregoing analysis is valid, then clearly, just as a hundred years ago teaching Bible to girls was considered revolutionary but is today approved by almost all rabbinic authorities (though Satmar still has some reservations), and just as over the past fifty years the same pattern has held for the teaching of Mishnah, so there is reason to expect that the acquisition of a facility with talmudic, halakhic and midrashic sources will ultimately become an integral part of any solid Jewish education, for boys and girls alike.

NOTES

1. The present article is an attempt to come to terms with the question left open in Joel B. Wolowelsky's article, "Modern Orthodoxy and Women's Changing Self-Perception," *Tradition*, 22:1, Spring 1986, pp. 65–81 (and see also exchange in *Tradition*, 22:4, Winter 1987, pp. 117–120): "Why . . . the hesitation in Modern Orthodox yeshivot in teaching Talmud to girls" (p. 78).
2. Menahem M. Brayer, *The Jewish Woman in Rabbinic Literature* (Hoboken, NJ: KTAV, 1986), ch. 6 and *passim*, provides a convenient extensive survey of sources regarding the education of the Jewish woman.
3. We have evidence of this even in the mishnaic period. See Mishnah *Nedarim* 4:3: "[If one is under a vow not to benefit from his neighbor . . . the neighbor] may nevertheless teach Scripture to his sons and daughters."
4. The Arabic original is brought by J. Blau, *Teshuvot ha-Rambam* I (Jerusalem, 1958), pp. 50–52. Parts of it are quoted in Hebrew translation in Simcha Assaf, *Mekorot Le-Toledot ha-Hinnukh be-Yisrael* III (Tel-Aviv: Devir, 1936), source 2, pp. 2–3; and in Shlomo Goitein, *Sidrei Hinnukh mi-Tekufat ha-Rambam* (Jerusalem, 1962), pp. 70–71; as well as in Nathan Morris, *A History of Jewish Education*, Book II, Part I, Hebr. ed. (Jerusalem: Reuben Mass, 1977), p. 177.
5. See Beryl Smalley, *The Study of the Bible in the Middle Ages*, (paperback ed.: University of Notre Dame Press, 1964; first ed.: Oxford 1940; rev. 1951), p. 78, who quotes from the anonymous pupil's work, *Commentarius Cantabrigiensis in Epistolas Pauli e Schola Petri Abalardi* ii 434; ed. A. Landgraf (South Bend, Indiana: Notre Dame, 1937). (Nathan Morris, *op. cit.*, Hebrew ed. II/I, pp. 385–386, incorrectly ascribes it to Abelard himself, giving a faulty bibliographical reference.)
6. See also the discussion in the *Hagahot Maimuniyyot*, *Hilkhot Tefillah*, ch. 12, sect. 19; and also the Responsa of the Maharam of Rothenburg, Prague, sect. 108, as well as the comments of the Ran (Rabbenu Nissim, an important 14th-century Spanish *posek*) to BT *Meg.* 23a, which *prima facie* imply that in the Middle Ages women were sometimes even taught to read the weekly Torah portions. The author of *Hagahot Maimuniyyot* was Meir ha-Kohen of Rothenburg (13th century), who was a pupil of R. Meir b. Baruch of Rothenburg (Maharam), and brother-in-law of Mordekhai b. Hillel Hacohen (Mordekhai). The *Hagahot Maimuniyyot* is one of the most important sources for the *pesika* of the Ba'alei ha-Tosafot of Germany and France (Ashkenaz). Note too, the *pesak* in *Beit Yosef*, *Orah Hayyim* 282.
7. Assaf, *op. cit.*, Vol. I, No. 10, pp. 17 ff., sect. 13. Assaf uses the Mekitsei Nirdamim ed. (1891) which is based on the Palma ms., although the Mossad Harav Kook edition, Jerusalem, sect. 313 has a different reading.
8. Yaacov Katz, *Masoret u-Mashber—Ha-Hevra ha-Yehudit be-Motsa'ei Yemei ha-Beinayim* (Jerusalem: Mossad Bialik, 1963), p. 276.
9. See, e.g., Katz, *op. cit.*, p. 297.
10. See Aharon Sursky, *Toledot ha-Hinnukh ha-Torati*, (Bnei Brak: Or ha-Hayyim, 1967), pp. 280–289; also, Immanuel Etkes, "The Family and the Study of Torah among Lithuanian Talmudist Circles in the 19th Century" (Hebrew), *Zion* 51, 5746, 87–106:89; and see also, Norman Lamm, *Torah Lishmah in the Works of Rabbi Hayyim of Volozhin*

- and his Contemporaries, (Hebrew) (Jerusalem: Mossad Harav Kook, 1972), introd., particularly p. 32.
11. See Lamm, *op. cit.*, 58 ff. for a discussion of the question of to what extent R. Hayyim of Volozhin's *Nefesh ha-Hayyim* should be given a place in the anti-Hasidic polemic. If our thesis is correct, then it is in any event relevant. See also, Etkes, "Shitato u-Fo'alo shel R. Hayyim mi-Volozhin ki-Teguvat ha-Hevra Ha-Mitnaggedet la-Hasidut," *PAAJR* 38–39 (1972), pp. 16–18.
 12. Brayer, *op. cit.*, p. 39 writes that the Hasidah "was engaged in making a living (*zorgen for parnosse*) while her husband traveled to see the Rebbe. . . . The Hasidah especially rejoiced in helping out with all the necessary preparations for her husband to make his journey together with the children (and other Hasidim) to the Rebbe for a *Yom Tov* (holiday) or another day of rejoicing. . . . The true Hasidah did not really mind when she had to be left at home and could not personally participate." However, on pp. 171–172 he brings first-hand evidence for quite a different reaction, for he there quotes the anguish expressed by no less a loyal Hasidah than Sara Schnirer. We read, "When the days of Elul arrived, she (Sara Schnirer) observed the crowds of old and young Hasidim flocking to their Rebbes, where they would spend the Holy Days together to become inspired by Torah and *kedushah*." He then quotes from her diary, "We the wives and daughters stay home with the little ones. Our Yom Tov is an empty one, bare of Jewish intellectual involvement. . . . The mother goes to *Shul*. The service rings faintly into the fenced and boarded women's gallery."
 13. See Katz, *op. cit.*, p. 282.
 14. Though this revolution in boys' education left no positive mark on that of the girls at the time, eventually the "yeshivah" form and girls caught up with each other. I refer to the Bnei-Akiva Ulpanot, which are in many respects yeshivot for girls, albeit zealously retaining the notion that Talmud study belongs exclusively to the masculine role.
 15. A word of explanation may perhaps be called for. The labelling of behaviors and pursuits as masculine/feminine has always provided a powerful self-fulfilling incentive. A personal example: I clearly recall my attempt as a 12-year-old to hide from my parents the scratches and bruises I had suffered while climbing the rocks in New York's Central Park. The hurt of the wounds was not nearly as painful as the strong feeling of guilt and shame over having been engaged in such an "unladylike" activity. Rock climbing was for boys. A real boy would be good at it, and real girls wouldn't want to do it. *Mutatis mutandis*, when *Talmud Torah*, and particularly proficiency in the intricacies of casuistic Talmud study, came to be looked upon as being the major hallmark of true Jewish manhood—it would of course be axiomatically inappropriate for girls and women.
 16. For Jewish education in Germany see Mordecai Eliav, *Ha-Hinnukh ha-Yehudi be-Germaniah bi-Yemei ha-Haskalah ve-ha-Emantsipatsiah* (Jerusalem, 1960).
 17. *Op. cit.*, pp. 227–232.
 18. *Op. cit.*, p. 230; and see also Hirsch's remarks at the beginning of his *Horeb*.
 19. See for example, the oft-quoted *pesak* of the *Hafets Hayyim* (1838–1933) in his *Likkutei Halakhot*, to *Sotah* 9a and 21b: "Formerly when a woman lived in her father's home . . . there seemed to be no necessity to teach a woman Torah; but nowadays where women are no longer confined to the home and secular education is open to them, one should teach them Torah to prevent them from leaving Judaism and forgetting their traditional values." See also Getsel Ellinson, *The Woman and the Mitsvot: An Anthology of Rabbinic Teaching*, (Hebrew) (Jerusalem: Religious Department for the Diaspora of the World Zionist Organization, 1975), pp. 168–171 for additional material in a similar vein; and Brayer, *op. cit.*
 20. There is a distinction made in the sources between *hanhagah* and/or *hora'ah* on the one hand and *serarah* on the other. Rabbi Bakshi Doron, *Responsa Binyan Av*, Jerusalem 1982, no. 65 (also in *Torah she-be-al Peh* [annual] XX, Mossad Harav Kook 5739, 66–78), and *Encyclopedia Talmudit*, s.v. *hora'ah*, p. 193, and bibliography, *idem*, note 109, write that although *serarah* (positions which involve coercion), were and quite often still are considered problematic—with varying degrees of reservation respecting the holding of such positions by women—*hora'ah* and *hanhagah* are permitted by a broad spectrum of *posekim*.
 21. Respecting the technological advances in the field of housework, society as a whole, rather than women alone, are the ultimate gainers, just as the deliverance of men from the curse in

- Genesis* 3:17–19 (less than 10% of the population in industrial countries now earn their livelihood from farming) has greatly raised the quality of life for all—both for men and for women.
22. For a beautiful mystical representation of men's role in the synagogue, see *Sefer ha-Zohar* iii, 126a (Munkatch 1915, repr. Reuben Margalio, Mossad Harav Kook 1946), which describes the constitution of the *minyan* in terms of the configuration of the mystical *Adam Kadmon*—the symbolical “body,” which then becomes “enspirited” by the *Shekhinah*.
 23. Maimonides, *Hilkhot Talmud Torah* 1:13, though he too apparently recognized the possibility of their developing their spiritual capabilities. See, e.g., *Hilkhot Teshuvah* 10:5 (end).
 24. Maimonides, *Commentary to Mishnah, Niddah* 5:6 (= comm. to BT *Niddah* 45b), and see similarly Ibn Ezra to *Leviticus* 21:4.
 25. Indeed, as Wolowelsky, *op. cit.*, p. 78 points out, “Boys are taught Talmud in a modern Orthodox yeshiva not necessarily because they are destined to become *talmidei hakhamim* or *matmidim*, but because a true understanding of Torah and *halakhah* is closed to someone who cannot open a Talmud or *sefer halakhah*.”
 26. Note however that even in the Talmud, the source of the familiar midrashic exegesis of the verse from Psalms 45:14, “*Kol kevudah bat-melekh penimah* (All glorious is the king's daughter within the palace),” it was not always considered to be a mandatory operative ideal—see e.g., BT *Gittin* 12a—and this connotation is entirely absent from the traditional commentaries *ad loc.* who take it to refer to *Keneset Yisrael*.
 27. *Hilkhot Talmud Torah* 1:13. I refrain from discussing the difference mentioned by the *posekim* between *Torah she-bi-ketav* and *Torah she-be-al peh* for women, for there is very little to add to what has already been said by those who have the requisite learning and authority to make meaningful statements on the matter, and the material is both well known and readily available.

I will therefore confine myself here to pointing out that Rabbi Eliezer's dictum in Mishnah *Sotah* 3:4, (BT *idem* 20a), “Whoever teaches his daughter Torah teaches her *tiflut*,” could not in any event have referred to Gemara, since R. Eliezer was a Tanna. It is sometimes claimed that it originally meant Midrash, and indeed, Abudarham (14th-cent. Spanish commentator to the Siddur) has noted that Midrash serves in the rubric of *Torah she-be-al peh* in the morning prayer–study pericope (see *Abudarham ha-Shalem*, Wertheimer ed., Jerusalem, 1963, p. 48). But in that case, R. Eliezer's dictum is not followed *le-halakhah*, for girls are encouraged to study this form of *Torah she-be-al peh*.

A survey of the *halakhic* material supporting and even encouraging women's studying Talmud can be found in Wolowelsky, *op. cit.*, pp. 77–79, and in the sources cited in notes 28–30. For a general overview of the major trends see Ellinson, *op. cit.*, pp. 160–171, and Brayer, *op. cit.*, who also mentions daughters of several distinguished rabbinical figures who were enabled to achieve significant levels of Torah, including talmudic, learning. They presumably cannot be disregarded in terms of relevant precedents.